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Of Attorneys for Debtor Edward A. Ariniello, Jr.

UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re:

EDWARD A. ARINIELLO, JR.,

Debtor.

Case No. 21-31142-dwh11

DEBTOR'S MOTION TO EXTEND TIME
TO FILE CHAPTER 11 PLAN

Edward A. Ariniello, Jr. (the "**Debtor**") hereby moves this Court for the entry of an Order extending the deadline by which Debtors' Chapter 11 Plan must be filed. In support of the motion, Debtor asserts the following:

1. On May 17, 2021, (the "**Petition Date**"), the Debtor commenced a bankruptcy case by the filing of a voluntary petition for relief under Chapter 11 Subchapter V of the United States Bankruptcy Code.

2. Pursuant to 11 U.S.C. § 1189, the Debtors were to file a plan "not later than 90 days after the order for relief under this chapter, except that the court may extend such period if the need for an extension is attributable to circumstances for which the debtor should not justly be held accountable." 11 U.S.C. § 1189(b). In this case the Chapter 11 Plan was to be filed by August 16, 2021.

3. Debtor requests an extension of time to file a Plan, and asserts that the requested extension is attributable to circumstances for which the Debtor should not be accountable. The Debtors and Counsel have been working diligently on the formation of a viable plan. Debtor's counsel is unable to file the plan by the deadline, due to technical difficulties related to working remotely. Debtor needs only a short, one-day extension of time to enable counsel to finalize and file the Plan once counsel can work with staff to finalize the Plan and complete the filing.

WHEREFORE, the Debtors pray for the Court to enter an Order extending the deadline by which the Debtor's Chapter 11 Plan must be filed, from August 16, 2021, to August 17, 2021.

DATED: August 16, 2021

MOTSCHENBACHER & BLATTNER LLP

/s/ Nicholas J. Henderson

Nicholas J. Henderson, OSB #074027
Of Attorneys for Debtors

CERTIFICATE OF SERVICE

I hereby certify that I served the foregoing **DEBTOR'S MOTION TO EXTEND TIME TO FILE CHAPTER 11 PLAN** on the following person(s) through operation of the Court's CM/ECF electronic filing system:

- NICHOLAS J HENDERSON nhenderson@portlaw.com, tcoble@portlaw.com; tsexton@portlaw.com; shalstead@portlaw.com; hendersonnr86571@notify.bestcase.com
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- US Trustee, Portland USTPRegion18.PL.ECF@usdoj.gov

DATED: August 16, 2021

MOTSCHENBACHER & BLATTNER LLP

By: /s/ Nicholas J. Henderson
Nicholas J. Henderson, OSB #074027
Of Attorneys for Debtor